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Attorneys for Defendant

YANKA INDUSTRIES, INC. d/b/a

MASTERCLASS

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

ALAN SILVA and ELIZABETH
MALATY-UHR, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

YANKA INDUSTRIES, INC. d/b/a
MASTERCLASS

Defendant.

Case No. 3:24-cv-05264-JD

**DECLARATION OF SHERI PAN IN
SUPPORT OF DEFENDANT YANKA
INDUSTRIES, INC. d/b/a
MASTERCLASS'S MOTION TO
DISMISS THE SECOND AMENDED
COMPLAINT**

Judge: Hon. James Donato

Hearing Date: January 23, 2025

Time: 10:00 a.m.

Courtroom: 11, 19th Floor

1 I, Sheri Pan, declare as follows:

2 1. I am an attorney in the law firm of ZwillGen Law LLP, a member of the Bar of
3 California, and am admitted to practice before this Court in the above related matter. I am one of
4 the counsel for Defendant in this action. I make this declaration based on my own personal
5 knowledge. If called upon to testify, I could and would testify competently to the truth of the
6 matters stated herein.

7 2. Exhibit A is a true and accurate copy of the webpage appearing
8 [https://web.archive.org/web/20241008190852/https://developers.facebook.com/docs/meta-](https://web.archive.org/web/20241008190852/https://developers.facebook.com/docs/meta-pixel/get-started/)
9 [pixel/get-started/](https://web.archive.org/web/20241008190852/https://developers.facebook.com/docs/meta-pixel/get-started/). I located the webpage by taking the following steps:

- 10 a. I browsed to the Internet Archive's homepage at <https://archive.org/>;
- 11 b. I entered the URL "https://developers.facebook.com/docs/meta-pixel/get-started"
12 into the field for the Internet Archive's Wayback Machine, located at the top of the
13 page;
- 14 c. On search results page, I browsed to the archived version of the webpage
15 appearing at <https://developers.facebook.com/docs/meta-pixel/get-started> on
16 October 8, 2024 (i.e., near the date the Second Amended Complaint was filed),
17 clicked on the version archived at 19:08:52, and took a screen capture of the
18 resulting webpage.

19 I declare under penalty of perjury under the laws of California and the United States of
20 America that the foregoing statements are true and correct to the best of my knowledge,
21 information, and belief.

22
23
24 Dated: November 14, 2024

By: 
Sheri Pan